## UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

IN RE: CASE NO.: 3:18-bk-00800-JAF

GEA SEASIDE INVESTMENT, INC. Chapter 11

Debtor(s).

## MOTION FOR ENTRY OF FINAL DECREE AND FINAL REPORT/CERTIFICATE OF SUBSTANTIAL CONSUMMATION

## NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 14 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail. If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at 300 N. Hogan Street, Suite 3-150, Jacksonville, Florida 32202 and serve a copy on the movant's attorney, Taylor J. King at 5452 Arlington Expressway, Jacksonville, Florida 32211, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

GEA SEASIDE INVESTMENT, INC., by and through its undersigned counsel, moves this Court for entry of a Final Decree and respectfully represent:

- 1. The Chapter 11 Plan in this case was confirmed on July 20, 2020.
- 2. The case has been substantially consummated and the attorney fees as awarded by the Court have been paid in full (or are being paid as agreed) and all taxes and other administrative claims have been paid or are being paid in full.

- 3. Debtor has made distributions pursuant to the Confirmation Order.
- 4. Debtor's certificate of substantial consummation and affidavit in support is attached as Exhibit 1.
- 5. Pursuant to Bankruptcy Rule 3022, the Debtor moves this Court for entry of a Final Decree.

Respectfully Submitted this 15 day of November, 2021.

By:/s/ Taylor J. King
Taylor J. King
Florida Bar No. 72049
5452 Arlington Expressway
Jacksonville, FL 32211
(904) 725-0822
(904) 725-0855 FAX
tjking@planlaw.com

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy hereof was furnished to Assistant U.S. Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801, by CM/ECF filing and/or U. S. Mail postage prepaid, this 15 day of November, 2021.

Law Offices of Mickler & Mickler

By: /s/ Taylor J. King
Taylor J. King
Florida Bar No. 72049
5452 Arlington Expressway
Jacksonville, FL 32211
(904) 725-0822
(904) 725-0855 FAX
tjking@planlaw.com

**EXHIBIT 1 – Affidavit in Support of Final Decree** 

IN RE: GEA SEASIDE INVESTMENT, INC.

CASE NO.: 3:18-bk-00800-JAF

Debtor

CERTIFICATE OF SUBSTANTIAL CONSUMMATION AND AFFIDAVIT IN SUPPORT OF MOTION FOR FINAL DECREE

STATE OF FLORIDA

**COUNTY OF VOLUSIA** 

I declare under penalty of perjury that I have read the foregoing Motion for Final Decree consisting of 4 sheets including this page, and that the statements contained in the Motion for Final Decree are true and correct to the best of my knowledge, information and belief. I am familiar with the Confirmation Order entered July 20, 2020 (Doc. No. 1282) and that Debtor has commenced payments as required by the Confirmation Order.

Date: //-15.7/

Signature:

GEA Seaside Investment, Inc.

By: Jack Abermann, Its President

Sworn to and subscribed before me

his day of November, 2021.

Notary Public, State of Florida

at Large

My Commission Expires:

MICHAEL H. KIMPTON Commission # HH 102810 Expires March 10, 2025

Bonded Thru Troy Fain Insurance 800-385-7019